

MATTHEW R. EASON, ESQ. (SBN 160148)  
KYLE K. TAMBORNINI, ESQ. (SBN 160538)  
KRISTOFOR K. HELM, ESQ. (SBN 301179)  
EASON & TAMBORNINI  
1234 H STREET, SUITE 200  
SACRAMENTO, CA 95814  
TELEPHONE (916) 438-1819  
FACSIMILE (916) 438-1820

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

MICHAELA MANAGO and QUENTIN PAUL  
GARCIA,

Plaintiffs,

vs.

HAP TRUCKING LTD; and GURHAM  
SINGH GILL,

Defendants.

Case No.: 2:24-cv-01496-TLN-CKD

**STIPULATION AND ORDER RE  
MODIFICATION OF PRETRIAL  
SCHEDULING ORDER**

THE PARTIES, THROUGH THEIR COUNSEL OF RECORD, agree to the following  
modifications to the Court's Pretrial Scheduling Order:

1. The parties have acted diligently throughout this matter, but due to a number of outstanding  
legal and discovery issues, the parties agree that additional time is necessary to complete  
discovery and prepare the matter for trial. The outstanding issues include:

a. Additional time will permit the parties to continue with meaningful discovery and  
investigation and to coordinate depositions of party witnesses, third party witnesses,  
and medical treaters;

b. Plaintiff Michaela Manago continues to treat and recover from her collision related

injuries, and she expects that there will be a substantial change in her treatment and/or recovery near and/or after the close of discovery; and

c. Additional time will permit the parties to explore alternative dispute resolution following the completion of additional discovery;

2. The parties agree that they have proceeded in good faith, and any delay is not due to a lack of diligence. The parties have propounded and responded to discovery, and party and witness depositions are scheduled in June 2025. The parties expect that additional discovery, and depositions will be necessary thereafter.

3. Subject to court approval, the parties have agreed to the following deadlines regarding discovery, expert discourse and the filing of dispositive motions:

a. Discovery, with the exception of expert discovery, shall be completed by December 19, 2025

b. The initial expert disclosure deadline shall be February 20, 2026

c. The supplemental expert disclosure deadline shall be April 3, 2026

d. Supplemental disclosures and responses pursuant to FRCP § 26(e) shall be exchanged no later than May 8, 2026

e. Dispositive motions shall be filed no later than June 12, 2026

Dated: May 29, 2025

**EASON & TAMBORNINI**

/s/ Kristofor K. Helm

KRISTOFOR K. HELM

Attorney for Plaintiffs

Dated: May 29, 2025

**LAW OFFICES OF WILLIAM L. BAKER**

/s/ David A. Serrano

DAVID A. SERRANO

Attorney for Defendants


**ORDER**

Good Cause appearing and based on the stipulation of the parties, the Pretrial Scheduling Order is modified as follows:

- a. Discovery, with the exception of expert discovery, shall be completed by December 19, 2025
- b. The initial expert disclosure deadline shall be February 20, 2026
- c. The supplemental expert disclosure deadline shall be April 3, 2026
- d. Supplemental disclosures and responses pursuant to FRCP § 26(e) shall be exchanged no later than May 8, 2026
- e. Dispositive motions shall be filed no later than June 12, 2026

IT IS SO ORDERED.

Dated: May 29, 2025

  
\_\_\_\_\_  
Troy L. Nunley  
Chief United States District Judge

**PROOF OF SERVICE**

I, ANGELICA SAECHAO, hereby declare and state that:

I am over the age of eighteen years, employed in the County of Sacramento, California, and not a party to the within action. My business address is 1234 H Street, Suite 200, Sacramento, California.

On May 29, 2025, I served the within:

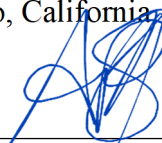
**STIPULATION AND ORDER RE MODIFICATION OF INITIAL PRETRIAL SCHEDULING ORDER**

on the parties as follows:

David A. Serrano  
Gordon Rees Scully Mansukhani, LLP  
Embarcadero Center West  
315 Pacific Avenue  
San Francisco, CA 94111  
Email(s): [dserrano@grsm.com](mailto:dserrano@grsm.com) ; [tjohnson@grsm.com](mailto:tjohnson@grsm.com)

- [X] (BY ELECTRONIC TRANSMISSION) EMAIL or ELECTRONIC TRANSMISSION:  
Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused the documents to be sent to the person at the e-mail addresses listed above. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.
- [X] (State) I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed May 29, 2025, at Sacramento, California



ANGELICA SAECHAO